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9 *Attorneys for Defendant Shoshana Zipor*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES,

13 Case No. 2:22-cr-00020-JAD-VCF

14 Plaintiff,

15 **Unopposed Motion to Modify Terms of**
16 **Probation (One Time Return of Passport)**

17 vs.

18 SHOSHANA ZIPOR,

19 Defendants.

20 Defendant Shoshana Zipor (the “defendant” or “Ms. Zipor”), by and through undersigned
21 counsel, moves this Court, pursuant to Federal Rule of Criminal Procedure 32.1(c), for a one-time
22 temporary return of her passports for the purpose of getting them renewed. The government does
23 not oppose this motion.

24 **Points and Authorities**

25 **A. Request for Return and Re-Surrender of Passport.**

26 On March 8, 2022, Ms. Zipor pled guilty to one count of False Statement in an Immigration
27 Document, in violation of 18 U.S.C. §§ 1546(a) and 2. Because this was her first appearance
before the Court, it doubled as her Initial Appearance. The Court released Ms. Zipor on a personal
recognition bond and directed her to surrender her passports and limited her travel to the
continental United States. ECF No. 7.

28 Since that time, United States Pretrial Services has been in possession of Ms. Zipor’s
29 United States and Israeli passports. The Defendant previously moved for, and the Court granted,

1 an unopposed request to travel to Israel that required the temporary return of her passports to her.
2 ECF No. 16. Ms. Zipor traveled abroad as allowed, returned to the United States as directed, and
3 promptly returned her passports to her Pre-Trial Services Officer, Jeremiah Bassard. Ms. Zipor
4 fastidiously adhered to the Court's previous instruction with regard to the return of her passports
5 and travel and has never otherwise abused the Court's trust with regard to her conditions of release.
6

7 On October 2, 2023, the Court sentenced Ms. Zipor to a three-year term of probation. Her
8 conditions of supervision do not contain a strict prohibition on travel, overseas or otherwise;
9 instead, she may leave "the federal judicial district where she is authorized to reside," if she first
10 obtains permission from the Court and/or her probation officer. ECF No. 32. As the Court knows
11 from Ms. Zipor's Pre-Trial Services Report, she has substantial family ties in Israel. PSR at ¶ 63
12 – 64. As the Court is also aware, Israel is in the midst of an armed conflict with the Palestinian
13 militant group Hamas, which has resulted in the kidnapping and killing of a large number of
14 Israelis.
15

16 Ms. Zipor is concerned that she may have to return to Israel on short notice to care for
17 family members who are harmed in the war. Both her United States and Israeli passports are
18 expired. She respectfully requests that the Court authorize the return of her passports for the sole
19 purpose of getting them renewed. Once renewed, Ms. Zipor will, within three days of receipt of
20 the new passports, return them to the custody of her assigned Probation officer.¹ In the event she
21 seeks to travel to Israel, she will make the appropriate motion to the Court.
22

23 **B. Conclusion**

24 For all the foregoing reasons, Mr. Zipor respectfully requests that the Court grant this
25 motion to modify her terms of probation to facilitate the temporary return of her passports. She
26

27

¹ Ms. Zipor estimates that it should take approximately six to eight weeks to renew her
28 United States passport and approximately three weeks to renew her Israeli passport.
29

1 respectfully requests that the Court issue an Order: (1) directing United States Pretrial Services to
2 return Ms. Zipor's passport to her for the sole purpose of having them renewed; and (2) requiring
3 Ms. Zipor to return her passport to United States Department of Probation within three business
4 days of receiving the renewed passports back from the immigration authorities.

5 DATED this 13th day of November 2023.

6 CLARK HILL PLLC

7 /s/ Crane Pomerantz

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11 *Attorneys for Defendant Zipor*

13 **It is so ordered:**

15 
16 Jennifer A. Dorsey
17 United States District Judge

18 Dated: November 16, 2023